

PP
19-cv-1032

January 11, 2025

Clerk of the courts
517 E. Wisconsin Ave. RM 362
Milwaukee, WI 53202



This letter is to inform the court the answer to the type of trial to choose. Whether to have a bench trial or a jury trial. The plaintiff selects a jury trial.

The plaintiff would also like to notify the courts of the following correspondence:

I've submitted the interrogatories to the defendants Lindsey Davis at Quarles and Brady, LLP by email January 10, 2025. The confirmed email address by Lindsey W. Davis was approved for document submission. I'm also mailing a paper copy to the defendants for their records.

There are a couple sections in the interrogatory document request that are identified to submit supplemental responses. I have notified Lindsey W. Davis that the responses in those categories will be submitted in a timely fashion. See email correspondence.

The question from the interrogatory request for expert witnesses to provide documents and electronically-stored information, including correspondence, expert reports, and drafts of reports, that were prepared by any person you expect to call as an expert witness with respect to damages in this matter and that contain the expert's opinions and stated basis for those opinions can't be concluded at this time or submitted in its complete answer before retaining and communicating/having correspondence with the experts in a manner that an answer to damages can be identified/communicated, concluded and/or submitted in the form of documents and electronically-stored information, including correspondence, expert reports, and drafts of reports, and answers to the questions related to those damages as requested by the defendants.

Expert witnesses are currently being selected at this time and the plaintiff will share all documents and electronically-stored information, including correspondence, expert reports, and drafts of reports, and answers to the questions related to those damages as requested by the defendants with full disclosure.

I'm attaching a copy of the interrogatory list of document requests by the defendants for reference. The document questions to be answered by supplemental responses are below:

#2. Produce all documents and electronically-stored information, including correspondence, expert reports, and drafts of reports, that were prepared by any person you expect to call as an expert witness with respect to damages in this matter and that contain the expert's opinions and stated basis for those opinions. If more than one expert witness is contemplated, please identify or segregate your response per expert.

2. Answer:

Plaintiff objects to this question as it is premature. Plaintiff has not retained expert witness in this matter. When retained plaintiff will provide their information through supplemental responses.

#3. Produce all documents and electronically-stored information which any person you plan to call as an expert witness with respect to damages reviewed, considered, prepared, or used as a part of or in the process of forming his or her opinions and conclusions, including but not limited to all notes, documents, correspondence, or other communication to or from the expert and you or your representative, and any notes or other records relating to any evaluation or examination of you performed by the expert witness. If more than one expert witness is contemplated, please identify or segregate your response per expert.

3. Answer:

Plaintiff objects to this question as it is premature. Plaintiff has not retained expert witness in this matter. When retained plaintiff will provide their information through supplemental responses.

#4. Produce the curriculum vitae for any person you plan to call as an expert witness with respect to damages.

4. Answer:

Plaintiff objects to this question as it is premature. Plaintiff has not retained expert witness in this matter. When retained plaintiff will provide the information through supplemental responses.

#10. Produce all documents and electronically-stored information reflecting or related to your damages and/or computation of your damages, including but not limited to documents related in any way to the answer to Interrogatory 10.

10. Answer:

Plaintiff objects to this question as it is premature. Plaintiff has not retained expert witness in this matter. When retained plaintiff will provide all the relevant information requested through supplemental responses.

Sincerely,

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